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Via ECF

Hon. George B. Daniels, USDJ
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

RE: Athena Art Finance Corp. v. Certain Artwork by Jean-Michel Basquiat
entitled *Humidity*, 1982
Docket No.: 20-cv-04669

Dear Judge Daniels:

We represent plaintiff Athena Art Finance Corp. in this *in rem* action against that Certain Artwork by Jean-Michel Basquiat entitled *Humidity*, 1982, and write in response to the April 29, 2021 letter from Satfinance's counsel requesting a pre-motion conference on a motion to compel.

On Monday, April 19th, at 3:49 pm, Satfinance made its document disclosure to us, demanding that we produce our responses by the close of business the very next day. "If Athena fails to make its production by the close of business tomorrow, April 20, 2021, then [Satfinance] will have no choice but to seek judicial intervention to compel Athena's compliance." Satfinance's document production of 463 pages was heavily redacted.

Over the past two weeks, we reviewed and likewise redacted our production. Our office communicated with Satfinance's counsel several times, explaining that this was taking longer than expected, due in part to the volume of our production. We advised counsel on April 29th that we expected this process to take a few more days. Despite this information, only several hours after we advised that we would need a few more days, counsel chose to involve the Court by requesting a pre-motion conference to address Athena's alleged delay.

As of this morning, and as we promised counsel, we completed our document production, totaling 2367 pages. Accordingly, counsel's request for a conference is, we submit, moot.

Respectfully submitted,
MAZZOLA LINDSTROM, LLP
/s/ Wendy J. Lindstrom
Wendy J. Lindstrom

cc: All counsel (via ECF)